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*Waste Reduction, Inc.*

"AGENTS FOR THE MANAGEMENT OF INDUSTRIAL WASTES"

5367 EAGLE STREET  
WHITE BEAR LAKE MINNESOTA 55110

October 25, 1982

Neil Knatterud  
North Dakota State Department of Health  
Division of Environmental Waste Management  
1200 Missouri Avenue  
Bismark, North Dakota 58501

Subject: Disposal of Residues from Artic Enterprises

Dear Neil,

Enclosed are the laboratory reports of the analysis of wastes and excavated soils from the Artic Enterprises property in Moorehead, Minnesota.

The August 2, 1982 analysis is of a sample of soil taken three feet from the surface in front of a buried open barrel of fiberglass resin. This sample was a "worst case" sample taken to evaluate the organic vapors trapped in the soil matrix. As a result of excavation, most of these vapors have been released. Even the worst case total concentration of 1ppm indicates minimal presence of organic vapors.

The August 16, 1982 samples were composited and analyzed to determine if they were hazardous wastes. Samples WR72301 through WR72306 were core samples drilled from the six barrels that were excavated from the site. Visual evaluation showed the wastes to be fiberglass resins and cured gelcoat. The drilling showed that the wastes were completely solid. Analysis of EP toxicity showed that the wastes were non-hazardous.

Samples WR72309, WR72310, and WR72311 were grab samples of non-containerized wastes and soils excavated from the area around the barrels. We could visually identify three types of questionable non-containerized materials.

WR72309 was a soil sample with black residue. WR72310 was a soil sample with a hard purple resin. WR72311 was a soft flaky chunk of uncured purple gel coat. Of the estimated forty yards of excavated materials, there was only 1-2 cu. feet of the uncured gel coat which was in a single chunk. The composite was analyzed for EP toxicity and exceeded the lead limit of 5.0 mg/l. The August 26, 1982 report shows the lead to be in sample WR72311. All the other samples have considerable total lead contents. From this I conclude that only the uncured gel coat is an EP toxic waste.

We propose to landfill these materials at either the Fargo sanitary landfill or at Big Dipper's Dakota sanitary landfill in Gwinner, North Dakota. The uncured resins will be separated from the excavated materials and dried and mixed in concrete to render it non-hazardous. Then both the forty yards of excavated materials and the two cubic feet of solidified resins will be transported to a disposal facility by bulk.

Please notify me of the acceptability of this plan so that I may begin negotiations with the disposal sites. If you have any questions please call me at 612-429-8874.

Very truly yours,

*James A. Kinsey*  
James A. Kinsey, President

JaK/sjk  
encl.